

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JANE DOES 1-4,	*	
Plaintiffs,	*	
v.	*	Civil Action No.
	*	1:21-CV-04278-WMR
RED ROOF INNS, INC., et al.;	*	
Defendants.	*	

**DEFENDANTS RED ROOF INNS, INC., FMW RRI NC, LLC, RED
ROOF FRANCHISING, LLC, RRI WEST MANAGEMENT, LLC, AND RRI
III, LLC’S MOTION TO SEVER PLAINTIFFS’ CLAIMS**

COME NOW Defendants Red Roof Inns, Inc. (“RRI”), FMW RRI NC, LLC (“FMW”), Red Roof Franchising, LLC (“RRF”), RRI West Management, LLC (“RRI West”), and RRI III, LLC (“RRI III”) (collectively “Red Roof Defendants”), by and through the undersigned counsel, and hereby move to sever the Plaintiffs’ claims in this action pursuant to Fed. R. Civ. P. 21 and 42(b), so that each of Plaintiffs’ cases proceed individually.

While the Red Roof Defendants recognize that this will require additional trials, assuming the claims survive summary judgment, the notions of fairness, reduction of confusion, prevention of prejudice, and a lack of overlapping evidence amongst the majority of Plaintiffs’ claims weigh in favor of severance in this case.

The Red Roof Defendants accordingly request that the Court sever the claims of Jane Doe 1, Jane Doe 2, Jane Doe 3, and Jane Doe 4.

This 9th day of May, 2023.

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NC, LLC, Red Roof
Franchising, LLC,
RRI West Management, LLC,
Westmont Hospitality Group,
Inc. and RRI III, LLC*

RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14 point size.

Dated: May 9, 2023.

/s/ *Adi Allushi*
Adi Allushi
Georgia Bar No. 852810

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May, 2023 a true and correct copy of the foregoing **Defendants Red Roof Inns, Inc., Red Roof Franchising, LLC, FMW RRI NC, LLC, RRI West Management, LLC, and RRI III, LLC's Motion to Sever Plaintiffs' Claims** was served upon the following parties and/or counsel of record via CM/ECF, as follows:

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